

EXHIBIT “A”

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 13
	:	
David Koch, Jr.	:	No. 23-12331-pmm
Brittany Lynn Hurley-Koch	:	
Debtors	:	
	:	
Scott F. Waterman, Esquire,	:	
Chapter 13 Trustee	:	Adv. No. 23-00069-pmm
Plaintiff	:	
	:	
vs.	:	
	:	
ClearOne Advantage, LLC	:	
Defendant	:	

CERTIFICATION FOR ENTRY OF DEFAULT JUDGMENT

SCOTT F. WATERMAN, ESQUIRE, pursuant to 28 U.S.C. §1746 hereby certifies under penalty of perjury under the laws of the United States of America that the forgoing is true and correct, that he is the Plaintiff in the above entitled action; that the Complaint and Summons in this action were served on Defendant ClearOne Advantage, LLC addressed to Defendant's Officer, Tomas Gordon, at ClearOne Advantage, LLC, 3500 Boston Street, Suite 413, Baltimore, MD 21224; that a Certificate of Service was filed with the court on October 26, 2023; that Defendant is not an infant, incompetent, nor in the military; that the time within which Defendant may answer the Complaint has expired; that Defendant has not answered or otherwise moved; and that the time for Defendant to answer or otherwise move has not been further extended.

Plaintiff's hourly rate rate is \$375.00 and has incurred \$1,425.00 attorney's fees in prosecuting this matter.

	Description of Legal Work	Hourly Rate	Time	Legal Fee
10/4/23	Draft demand letter for return of money seized from Debtor's account	\$375.00	0.5	\$187.50
10/19/23	Telephone Defendant & speak with Norma about returning money – email turnover letter	\$375.00	0.4	\$150.00
10/25/23	Contact Debtor's Counsel about turnover action and verify funds not received	\$375.00	0.2	\$75.00
10/25/23	Draft and file Turnover Complaint. Serve Defendant	\$375.00	1.8	\$675.00
11/28/23	Prepare Motion for Judgment	\$375.00	.9	\$337.50
				=====
Total Attorney's Fees				\$1,425.00

Executed on 11/28/23

/s/ Scott F. Waterman
SCOTT F. WATERMAN, ESQUIRE